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   Counsel for Robins Cloud LLP
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11
                          UNITED STATES BANKRUPTCY COURT
12
                           NORTHERN DISTRICT OF CALIFORNIA
13
                                SAN FRANCISCO DIVISION
14
   In re
                                           ) Case No. 19-30088 (DM)
15
   PG&E CORPORATION,
                                           ) Chapter 11
16
         and
                                           ) (Lead Case–Jointly Administered)
17
   PACIFIC GAS AND ELECTRIC
   COMPANY
18
                      Debtors
19
                                           ) REQUEST FOR RELIEF UPON
                                             DEFAULT IN SUPPORT OF MOTION
20
   Affects:
                                             FOR ORDER AUTHORIZING
                                             WITHDRAWAL OF COUNSEL
21
        PG&E Corporation
22
        Pacific Gas & Electric Company
                                             [RE: Dkt. Nos. 11660, 11661, 11662, and 11663]
23
     \boxtimes Both Debtors
24
   * All papers shall be filed in the Lead
25
   Case, No. 19-30088 (DM).
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1	REQUEST FOR ENTRY OF ORDER BY DEFAULT			
2	Under B.L.R. 9014-1(b)(4), Robins Cloud LP ("Firm") hereby requests that Court enter an			
3	order by default on its Motion for Order Authorizing Withdrawal of Counsel to Tasman Grant			
4	("Creditor") ¹ , Dkt. No. 11660 ("Motion").			
5	RELIEF REQUESTED IN THE MOTION			
6	The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the			
7	Creditor.			
8	NOTICE AND SERVICE			
9	A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of			
10	Counsel to Tasman Grant was filed concurrently with the Motion on December 6, 2021, Dkt. No.			
11	11662 ("Notice and Opportunity for Hearing"). The Motion, the supporting declaration of Robert			
12	Bryson, Dkt. No. 11661, and the Notice and Opportunity for Hearing were served as described in the			
13	Certificate of Service filed on December 6, 2021, Dkt. No. 11663.			
14	The deadline to file a response or opposition to the Motion has passed, and no opposition has			
15	been filed with the Court or received by the Firm.			
16	DECLARATION OF NO OPPOSITION RECEIVED			
17	The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,			
18	that:			
19	1. I am an individual over 18 years of age and competent to make this Declaration.			
20	2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly			
21	admitted to practice before all courts of the State of California and the United States District Court			
22	for the Northern District of California.			
23	3. I am counsel for the law firm of Robins Cloud LP (the "Firm"), attorneys of recor			
24	for Tasman Grant ("Creditor"). ²			
25				
26	¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other			
27	things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing			
28	Withdrawal of Counsel ("Bryson Decl."), ¶2, fn.1. ² Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.			

Case: 19-3RP8UESPPFORTRELIEFURON TOPARALLE FUNDING DECLEMENTATION 45 SUPPORT OF 4

1	4. I have reviewed the Court's docket in these Chapter 11 Cases and determined that	at	
2	no response or opposition has been filed with respect to the Motion.		
3	5. A proposed order will be lodged concurrently as provided for in B.L.R. 903	14	
4	1(b)(3)(A).		
5	WHEREFORE, the Firm hereby requests that the Court enter the proposed order file		
6	concurrently herewith granting the Motion for the reasons set forth therein.		
7	Executed on January 4, 2022.		
8	GRIMSHAW LAW GROUP, P.C.		
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10	/s/ Matthew W. Grimshaw Matthew W. Grimshaw		
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12	Attorneys for Robins Cloud LLP		
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2	CERTIFICATE OF SERVICE			
3	I hereby certify that on January 4, 2022, I caused the forgoing REQUEST FOR			
4	RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL to be electronically filed with the Clerk of the Court using			
5	the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, wit the exception of Tasman Grant.			
6				
7				
8	8 first-class mail, postage prepaid, to the follows	ing interested party:		
9	9 Tasman Grant	Tasman Grant		
10	4921 Crestmont Drive San Francisco, CA 94131	937 Sundown Trail Santa Rosa, CA 95404		
11				
12	12	/s/ Matthew W. Grimshaw		
13	13	MATTHEW W. GRIMSHAW		
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